

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

Case No. 17-BK-03283 (LTS)

(Jointly Administered)

**URGENT UNOPPOSED MOTION SEEKING EXTENSION OF DEADLINE TO FILE  
VERIFIED STATEMENT OF CITIGROUP GLOBAL MARKETS INC. DISCLOSING  
CONNECTIONS TO MATERIAL INTERESTED PARTIES PURSUANT TO  
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURES ACT**

To the Honorable United States District Court Judge Laura Taylor Swain:

Citigroup Global Markets Inc. (“CGMI”), investment banker and financial advisor to The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Commonwealth of Puerto Rico (“Commonwealth”), the Puerto Rico Sales Tax Financing Corporation (“COFINA”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System for the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Electric Power Authority (“PREPA”) and the Puerto Rico Public Buildings Authority jointly (“PBA,” with the Commonwealth, COFINA, HTA, ERS and PREPA referred to as

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

“Debtors”), as Title III debtors, by and through the Oversight Board, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”),<sup>2</sup> respectfully submits this motion (the “Motion”), for entry of an order, substantially in the form attached hereto as Exhibit A, extending the deadline for CGMI to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy In Disclosures Act* [ECF No. 20467] (“Order”) and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”). In support of this Motion, CGMI respectfully represents as follows:

**Relief Requested**

1. By this Motion, CGMI requests an order extending the deadline to file its final verified statement, pursuant to PRRADA, until June 30, 2022.
2. On February 22, 2022, the Oversight Board filed the *Motion of Financial Oversight and Management Board for Puerto Rico Requesting Order Approving Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20194] (the “PRRADA Motion”), seeking Court approval of a list of material interested parties attached thereto as Exhibit A (the “Initial MIP List”) pursuant to PRRADA.
3. On March 21, 2022, the Court entered its *Order Regarding Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20419], directing the Oversight Board to file an amended MIP List.
4. On March 29, 2022, the Oversight Board filed the *Notice of Filing Amended List of Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20458], which attached a list of material interested parties with respect to all Title III Debtors

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<sup>2</sup> PROMESA has been codified in 48 U.S.C. §§ 2101-2241.

as Exhibit A thereto (the “Amended MIP List”). The Amended MIP List broke out the material interested parties in separate schedules for each of the Title III Debtors.

5. On March 30, 2022, the Court entered the Order, which approved the Amended MIP List and directed all professionals to file the disclosures required under PRRADA by May 16, 2022.

6. CGMI is in the process of drafting its verified statement pursuant to PRRADA. In order to finalize and file the verified statement, CGMI will require an additional forty-five (45) days, that is until June 30, 2022. Accordingly, CGMI requests an extension of forty-five (45) days to submit its verified statement.

7. CGMI obtained the consent of the U.S. Trustee for this extension of time.

8. CGMI hereby certifies that there is a true need for urgent relief and that such urgency was not created through any lack of due diligence.

9. No prior request for the relief sought in this Motion has been made to this or any other court.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE CGMI respectfully requests the Court to enter the Proposed Order attached hereto as **Exhibit A**, granting the relief requested herein and all other relief that is just and proper.

Dated: May 16, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Carla-Garcia Benítez  
Carla García-Benítez  
USDC No. 203708

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*Counsel for Citigroup Global Markets Inc*

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

Case No. 17-BK-03283 (LTS)

(Jointly Administered)

**ORDER EXTENDING DEADLINE TO  
FILE VERIFIED STATEMENT PURSUANT TO  
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURES ACT**

Upon the *Urgent Unopposed Motion Seeking Extension of Deadline to File Verified Statement of Citigroup Global Markets Inc. Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosures Act* (the “Motion”);<sup>2</sup> and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

1. The Motion is granted as set forth herein.
2. The deadline for Citigroup Global Markets Inc. to file its verified statement pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20467] and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82, shall be extended to **June 30, 2022**.
3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
4. This Order resolves docket entry no. \_\_\_\_.

SO ORDERED.

Dated: \_\_\_\_\_, 2022  
San Juan, Puerto Rico

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LAURA TAYLOR SWAIN  
United States District Judge